

First named inventor: Jain
Serial no. 10/063,986
Filed 5/31/2002
Attorney docket no. BEA9-2002-0003-US1

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REMARKS

Claims 1-13

Claims 1, 3, 4, and 12 have been rejected under 35 USC 102(e) as being unpatentable over Shandony (6,675,261). Claims 2, 5-11, and 13 have been objected to as being dependent upon a rejected base claim, but which would be allowable if rewritten in independent form including all of the limitations of their base claims and any intervening claims. Claim 1 is an independent claim, from which claims 2-13 ultimately depend.

Claim 1 has been amended to incorporate the subject matter of objected-to claim 2, and claim 2 has been cancelled. Claim 2 had depended directly from claim 1. Therefore, Applicant submits that claim 1, and claims 3-13 that depend ultimately from claim 1, are allowable.

Claims 14-18

Claims 14-18 have been rejected under 35 USC 102(e) as being unpatentable over Shandony. Claim 14 is an independent claim, from which claims 15-18 ultimately depend. Applicant has amended claim 14 to remove some of its subject matter, particularly that which relates to the constraints that the canonical representation satisfies. Furthermore, Applicant has amended claim 14 to incorporate the allowable subject matter of claim 2. Therefore, Applicant submits that claim 14 is allowable, such that claims 15-18, which depend ultimately from claim 14, are also allowable.

Claims 19-20

Claim 20 has been rejected under 35 USC 101 as being directed to non-statutory subject matter. Claims 19-20 have been rejected under 35 USC 102(e) as being unpatentable over Shandony. Claim 19 is an independent claim, from which claim 20 depends.

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Claim 19 has been amended in two ways. First, the "computer-readable medium" has been amended to be a "tangible computer-readable data storage medium," so that there are no questions as to this claim being directed to statutory subject matter. Second, claim 19 has been amended to incorporate the allowable subject matter of claim 2. Applicant therefore subjects that claim 19 is allowable. Claim 20 has also been cancelled, rendering the rejection under 35 USC 101 moot as to this claim.

Added claims 21 and 22

Two claims have been added, claims 21 and 22. Claim 21 is a dependent claim depending from independent claim 1, and is directed to the constraints that the mathematically canonical set of zones can satisfy in one embodiment. Claim 21 is patentable at least because claim 1 is patentable.

Furthermore, claim 22 is a dependent claim depending independent from claim 14. It is also directed to the constraints that the canonical representation can satisfy in one embodiment, and further represents the subject matter that was removed from claim 14 via amendment, as noted above. Claim 22 is patentable at least because claim 14 is patentable.

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Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Mike Dryja, Applicants' Attorney, at 425-427-5094, so that such issues may be resolved as expeditiously as possible. For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,



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Date

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